

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA

IN RE PORK ANTITRUST LITIGATION

Case No. 18-cv-01776 (JRT-HB)

This Document Relates To:
ALL ACTIONS

**[PROPOSED] PROTECTIVE ORDER
CONCERNING *EX PARTE* LAWYER
COMMUNICATIONS**

Having considered Defendants' Motion for Protective Order, the Memorandum filed in support thereof, and all accompanying exhibits, **IT IS HEREBY ORDERED** that Defendants' Motion is **GRANTED**:

In representing their respective clients and contacting individuals regarding the subject of the representation, the lawyers in this action and all investigators working at their behest shall at the outset of the interview:

(1) fully disclose their representative capacity to the individual contacted, including the firm they are associated with, the party they represent, and their reason(s) for making contact;

(2) inquire and confirm the individual contacted is not a current employee of an adversary, and if they are, stop the interview immediately;

(3) inquire whether the individual contacted is currently represented, and if so, stop the interview immediately;

(4) inform the individual contacted of his or her right to refuse to be interviewed;

(5) inform the individual contacted of his or her right to have counsel of their choosing present during the interview; and

(6) inform the individual contacted that he or she should not divulge privileged communications during the interview.

SO ORDERED.

Dated _____, 2019

By the Court:

Magistrate Judge Hildy Bowbeer

